## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

C.B. by and through his	
next friend, Charleston DePriest, et al.	)
Plaintiffs,	) ) Civil Action No. 3:10cv663-CWR-FKB
v.	)
WALNUT GROVE CORRECTIONAL AUTHORITY, et al.	) ) )
Defendants.	) ) )

### JOINT MOTION FOR PROTECTIVE ORDER

The parties jointly request that the Court enter the proposed Protective Order to protect confidential information that could affect the security and operation of the Walnut Grove Security Correctional Facility (WGCF). The parties have discussed at length and agreed to specific terms that are detailed in the Agreed Protective Order.

The parties respectfully request the Court grant this Motion and enter the Agreed Protective Order.

Dated this 10<sup>th</sup> day of March, 2015

Respectfully submitted,

/s/Margaret Winter

Margaret Winter National Prison Project of ACLU 915 15th Street, NW, 7th Floor Washington, DC 20005

Phone: (202) 393-4930 Fax: (202) 393-4931

mwinter@aclu.org
(admitted pro hac vice)

/s/Jody E. Owens, II

Jody Owens, II, MSB No. 102333 Jennie Eichelberger, MSB102522 Southern Poverty Law Center 111 East Capitol Street, Suite 280 Jackson, Mississippi 39201 (601) 948-8882 (phone) (601) 948-8885 (fax) jody.owens@splcenter. Org jennie.eichelberger@splcenter.org

Robert B. McDuff Jacob W. Howard McDuff & Byrd 767 N. Congress Jackson, MS

Phone: (601) 969-0802 Fax: (601) 969-0804 rbm@mcdufflaw.com jake@mcdufflaw.com

#### ATTORNEY FOR PLAINTIFFS

JIM HOOD, ATTORNEY GENERAL STATE OF MISSISSIPPI

/s/ Harold E. Pizzetta, III\_

Harold E. Pizzetta, III, Bar No. 99867 Krissy C. Nobile, MS Bar No. 103577 Civil Litigation Division Office of the Attorney General Post Office Box 220 Jackson, Mississippi 39205 Telephone: (601) 359-3860 Facsimile: (601) 359-2003

hpizz@ago.state.ms.us knobi@ago.state.ms.us

Gary E. Friedman, MS Bar No. 5532 Todd Butler, MS Bar No. 102907 PHELPS DUNBAR, LLP 4270 I-55 North Jackson, Mississippi 39211-6391 Post Office Box 16114 Jackson, Mississippi 39236-6114

Telephone: 601-352-2300

Facsimile: 601-360-9777 friedmag@phelps.com todd.butler@phelps.com

# ATTORNEYS FOR DEFENDANT

## **CERTIFICATE OF SERVICE**

I, Jody E. Owens, II, hereby certify that a true and correct copy of the foregoing document was filed electronically. Notice of this filing will be sent by electronic mail to all parties by the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

SO CERTIFIED, this 10th day of March, 2015.

/s/Jody E. Owens, II Jody E. Owens, II